



**Good for the Economy.  
Good for the Environment.**

Thursday, December 3, 2015

Air and Radiation Docket and Information Center  
Environmental Protection Agency  
Mail code 28221T  
1200 Pennsylvania Ave, NW  
Washington, D.C. 20460  
Attention: Docket ID No. EPA-HQ-OAR-2010-0505

Administrator McCarthy:

These comments are in response to the Environmental Protection Agency's (EPA) proposed revisions to the 2012 New Source Performance Standards (NSPS) for the oil and gas industry. Our business leaders applaud and support EPA for proposing the first federal standards to cut methane pollution from new and modified sources in the oil and gas industry.

Climate change and growing greenhouse gas concentrations accelerate multiple threats to our economy, including severe storms, droughts, heat waves, and a rise in sea level. These threats come at an enormous cost to both our current economy and future generations. A recent EPA study estimated that the costs and economic losses due to climate change related storms will range between \$180 billion by 2100. Standards to ensure that companies manage, monitor, and limit methane emissions are crucially important to the health of our environment and economy.

E2 is a national, nonpartisan group of business leaders, investors, and professionals from every sector of the economy who advocate for smart policies that are good for the economy and good for the environment. Our members have founded or funded more than 2,500 companies, created more than 600,000 jobs, and manage more than \$100 billion in venture and private equity capital.

Methane emissions accelerate the rate of climate change, which threatens our economy and our environment. Methane is a highly potent greenhouse gas, up to 85 times more potent than carbon dioxide on a 20-year basis. The oil and natural gas industry, which is responsible for approximately a third of all U.S. methane emissions, has increased production in recent years and the trend is expected to continue in coming years. According to the 2014 Inventory of U.S. Greenhouse Gas Emissions and Sinks, the U.S.

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oil and gas industry leaks and intentionally releases almost eight million metric tons of methane a year. Therefore, we support the broad application and inclusion of methane standards and emission control requirements to sources already regulated for volatile organic compounds (VOCs) under the 2012 NSPS. We also support other provisions of the revised rule including the extension of standards to additional midstream sources to reduce methane emissions at transmission and storage segments and limits on venting gas during oil well completion.

While the proposed standards are an important first step in reducing methane, EPA needs to also address emissions from existing oil and gas sources. A 2014 study by ICF International projected that despite recent growth in oil and gas production, existing sources will be responsible for nearly 90 percent of methane emissions in 2018. The same low cost and widely available technologies that are the basis for the new source standards can be applied to existing sources, and we urge EPA to do so in order to reach the Administration's methane and overall greenhouse gas reduction goals.

The technologies to reduce methane emissions are widely available and affordable, and implementing them makes common sense for our public health, our economy and the country. E2 applauds the EPA for taking this step to limit methane pollution. This commitment will create value in our economy, improve the health of our work force, and ensure that our environment is healthy for future generations.

Sincerely,

Bob Keefe  
Executive Director  
Environmental Entrepreneurs (E2)

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